

EXHIBIT F

Declaration of Christina
Leathers, Human
Resources

EXHIBIT F

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Specially Appearing as
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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

MARCELL WILLIAMS,

Plaintiff,
vs.

WARDEN OF SOUTHERN DESERT
CORRECTIONAL CENTER, et al.,

Defendants.

CASE NO. 2:20-cv-00639-RFB-BNW

DECLARATION OF
CHIEF OF HUMAN RESOURCES,
CHRISTINA LEATHERS

I, Christina Leathers, hereby declare based on personal knowledge and/or information and belief, that the following assertions are true.

1. I am currently employed by the Nevada Department of Corrections (NDOC) as Chief of Human Resources. As part of my regular duties, I ensure that all NDOC staff is provided with staff bulletins and communications from the executive leadership of the NDOC, which includes among other individuals, Director Charles Daniels, Deputy Director of Operations Harold Wickham, and Medical Director Michael Minev.

2. When any of the above individuals wish to ensure that an all staff announcement is disseminated to the staff. It is also my responsibility to provide staff bulletins and announcements that pertain to working conditions that may effect our employees.

3. In my capacity as Chief of Human Resources, I have had the opportunity to review **Exhibits A, E, J, and M**, that I understand will be used in case number 2:20-cv-00639-RFB-BNW in the United States District Court for the District of Nevada. I can attest

1 that I was either a recipient or author of each of the emails contained in Exhibits A, J, and
2 M. In addition, I attest that Exhibit E is a true and accurate copy of Administrative
3 Regulation (AR) 107. I further attest that it is this version of AR 107 that I referenced in
4 my email to all staff email dated March 2, 2020. I also recall that while the directives set
5 forth in the March 2, 2020 email were initiated no later than March 3, 2020, this email was
6 again disseminated to the entire staff on March 13, 2020. True copies of both these emails
7 are in Exhibit A.

8 4. I declare under penalty of perjury pursuant to 28 U.S.C. section 1746 that the
9 foregoing is true and correct.

10 EXECUTED this 8th day of April, 2020

11 /s/ Christina Leathers*
12 CHRISTINA LEATHERS
13 Chief of Human Resources,
14 Nevada Department of Corrections
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27 * Pursuant to Temporary General Order 2020-05, entered by Chief Judge Du on March 30,
28 2020, <https://www.nvd.uscourts.gov/wp-content/uploads/2020/03/GO-2020-05-re-COVID-19-Remote-Hearings.pdf>, Chief Leathers has provided authorization to counsel to affix her electronic signature to this Declaration.